

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA

FILED

MAY 05 2015

Phil Lombardi, Clerk
U.S. DISTRICT COURT

1. EDWARD WATSON,

Plaintiff,

v.

1. RECIPROCITY RESTAURANT
GROUP, LLC, d/b/a CHURCH'S CHICKEN,
an Oklahoma limited liability company,

and

2. MODERN BUSINESS ASSOCIATES,
INC., a foreign corporation,

Defendants.

15 CV - 241 GKF TLW

Case No. _____

NOTICE OF REMOVAL

Defendant Reciprocity Restaurant Group, LLC, d/b/a Church's Chicken ("RRG"), for its
Notice of Removal, states the following:

1. RRG is named as a defendant in a civil action brought against it in the District Court
for Tulsa County, State of Oklahoma, under the case styled, *Edward Watson, Plaintiff v. Reciprocity
Restaurant Group, LLC, d/b/a Church's Chicken, an Oklahoma limited liability company, and
Modern Business Associates, Inc., a foreign corporation, Defendants*, Case No. CJ-2014-04960.

2. Plaintiff's Petition alleges one claim against RRG: discrimination in hiring based on
race in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000(e) *et seq.*
("Title VII").

Fees pd

3. The United States District Courts have original jurisdiction over Plaintiff's claim because Plaintiff's claim arises under the Constitution, laws, or treaties of the United States. Accordingly, this action may be removed pursuant to 28 U.S.C. §§1331 and 1441.

4. The aforementioned action was commenced by service of summons upon RRG via U.S. Certified Mail on April 7, 2015. Thus, this Notice of Removal is timely filed under the provisions of 28 U.S.C. §1446.

5. Copies of all process, pleadings and orders filed in the aforementioned state action, including the state court docket sheet, are attached hereto and marked as Exhibit "A."

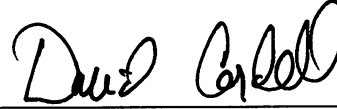
6. Copies of all process, pleadings and orders served upon RRG are attached hereto and marked as Exhibit "B."

7. This action apparently is related to another civil action filed in the District Court for Tulsa County, State of Oklahoma, under the case styled, *April Watson, Plaintiff v. Reciprocity Restaurant Group, LLC, d/b/a Church's Chicken, an Oklahoma limited liability company, and Modern Business Associates, Inc., a foreign corporation, Defendants*, Case No. CJ-2014-04961. The two lawsuits are filed against RRG and MBA, both allege identical operative facts, both allege the same one claim against both RRG and MBA, both were filed and served on the same dates, and both were filed by the same attorney. RRG is filing a Notice of Removal and related documents to effect the removal of both cases on this same date.

WHEREFORE, RRG prays that this action be removed from the District Court for Tulsa County, State of Oklahoma, to this Court.

DATED this 5 day of May, 2015.

Respectfully submitted,



David R. Cordell, OBA #11272
CONNER & WINTERS, LLP
4000 One Williams Center
Tulsa, OK 74172-0148
(918) 586-5711
(918) 586-8547 (fax)
dcordell@cwlaw.com

ATTORNEYS FOR DEFENDANT
RECIPROCITY RESTAURANT GROUP,
LLC

CERTIFICATE OF SERVICE

I certify that on the same date this **Notice of Removal** was filed in the United States District Court for the Northern District of Oklahoma a true and correct copy of said **Notice of Removal** was served upon the above-named Plaintiff, by mailing said copy to Plaintiff's attorneys of record, Christopher L. Camp, Camp Law Firm, 7122 S. Sheridan Road, Suite #3-382, Tulsa, OK 74133, and further that a copy of said **Notice of Removal** was hand delivered to Sally Howe-Smith, Court Clerk, District Court in and for Tulsa County, 406 Courthouse, 500 Denver Avenue, Tulsa, Oklahoma 74103-3844, for filing that same date.



David R. Cordell



The information on this page is NOT an official record. Do not rely on the correctness or completeness of this information. Verify all information with the official record keeper. The information contained in this report is provided in compliance with the Oklahoma Open Records Act, 51 O.S. 24A.1. Use of this information is governed by this act, as well as other applicable state and federal laws.

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY, OKLAHOMA

EDWARD WATSON,
Plaintiff,

v.

RECIPROCITY RESTAURANT GROUP LLC, DBA
CHURCHES CHICKEN
Defendant, and
MODERN BUSINESS ASSOCIATES INC,
Defendant.

No. CJ-2014-4960
(Civil relief more than \$10,000:
DISCRIMINATION)

Filed: 12/29/2014

Judge: Kuehn, Dana

PARTIES

MODERN BUSINESS ASSOCIATES INC, Defendant
RECIPROCITY RESTAURANT GROUP LLC, Defendant
WATSON, EDWARD, Plaintiff

ATTORNEYS

Attorney

Camp, Christopher (Bar #18541)
7122 S. SHERIDAN RD., STE. #2-382
TULSA, OK 74133

CORDELL, DAVID R (Bar #11272)
CONNER & WINTERS, LLP
4000 ONE WILLIAMS CENTER
TULSA, OK 74172

Represented Parties

WATSON, EDWARD

RECIPROCITY RESTAURANT GROUP LLC,

EVENTS

None

ISSUES

EXHIBIT

A

For cases filed before 1/1/2000, ancillary issues may not appear except in the docket.

Issue # 1. Issue: DISCRIMINATION (DISCRIM)
 Filed By: WATSON, EDWARD LEE
 Filed Date: 12/29/2014

Party Name	Disposition Information
<u>Defendant:</u> RECIPROCITY RESTAURANT GROUP LLC	Pending.
<u>Defendant:</u> MODERN BUSINESS ASSOCIATES INC	Pending.

DOCKET

Date	Code	Description	Count	Party	Amount
12-29-2014	TEXT	Civil relief more than \$10,000 Initial Filing.	1		
12-29-2014	DISCRIM	DISCRIMINATION			
12-29-2014	DMFE	DISPUTE MEDIATION FEE			\$ 2.00
12-29-2014	PFE1	PETITION <i>Document Available (#1028057739)</i>			\$ 163.00
12-29-2014	PFE7	LAWLIBRARY FEE			\$ 6.00
12-29-2014	OCISR	Oklahoma Court Information System Revolving Fund			\$ 25.00
12-29-2014	CCADMIN02	Court Clerk Administrative Fee on \$2 Collections			\$ 0.20
12-29-2014	OCJC	Oklahoma Council on Judicial Complaints Revolving Fund			\$ 2.00
12-29-2014	OCASA	Oklahoma Court Appointed Special Advocates			\$ 5.00
12-29-2014	CCADMIN04	Court Clerk Administrative Fee on Collections			\$ 0.50
12-29-2014	LTF	Lengthy Trial Fund			\$ 10.00
12-29-2014	SMF	Summons Fee (Clerks Fee)-2			\$ 10.00
12-29-2014	SMIMA	Summons Issued - Mailed by Attorney			
12-29-2014	TEXT	OCIS has automatically assigned Judge Kuehn, Dana to this case.			
12-29-2014	ADJUST	ADJUSTING ENTRY: MONIES DUE TO AC09-CARD ALLOCATION			\$ 5.60
12-29-2014	ACCOUNT	ADJUSTING ENTRY: MONIES DUE TO THE FOLLOWING AGENCIES REDUCED BY THE FOLLOWING AMOUNTS: CJ-2014-4960: AC81 Lengthy Trial Fund -\$0.25 CJ-2014-4960: AC79 OCIS Revolving Fund -\$0.63 CJ-2014-4960: AC64 Dispute Mediation Fees -\$0.05 CJ-2014-4960: AC59 Oklahoma Council on Judicial Complaints Revolving Fund -\$0.05			

CJ-2014-4960: AC58 Oklahoma Court Appointed Special
Advocates -\$0.13
CJ-2014-4960: AC31 Court Clerk Revolving Fund -\$0.02
CJ-2014-4960: AC23 Law Library Fee -\$0.15
CJ-2014-4960: AC01 Clerk Fees -\$4.32

12-29-2014 ACCOUNT Receipt # 2014-3000069 on 12/29/2014.
Payor:CAMP CHRISTOPHER L Total Amount Paid: \$223.70.
Line Items:
CJ-2014-4960: \$168.68 on AC01 Clerk Fees.
CJ-2014-4960: \$5.60 on AC09 Card Allocations.
CJ-2014-4960: \$5.85 on AC23 Law Library Fee.
CJ-2014-4960: \$0.68 on AC31 Court Clerk Revolving Fund.
CJ-2014-4960: \$4.87 on AC58 Oklahoma Court Appointed
Special Advocates.
CJ-2014-4960: \$1.95 on AC59 Oklahoma Council on Judicial
Complaints Revolving Fund.
CJ-2014-4960: \$1.95 on AC64 Dispute Mediation Fees.
CJ-2014-4960: \$24.37 on AC79 OCIS Revolving Fund.
CJ-2014-4960: \$9.75 on AC81 Lengthy Trial Fund.

04-27-2015 EAA SPECIAL ENTRY OF APPEARANCE / DAVID R CORDELL
ENTERING AS COUNSEL / W-CS / CERTIFICATE OF SERVICE
Document Available (#1029448549)

RECIPROCITY
RESTAURANT
GROUP LLC

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA



EDWARD WATSON,

Plaintiff,

vs.

RECIPROCITY RESTAURANT
GROUP, LLC, d/b/a CHURCH'S
CHICKEN, an Oklahoma limited
Liability Company and MODERN
BUSINESS ASSOCIATES, INC., a
foreign corporation,

Defendants

Case No. CJ-2014-04960
Judge Kuehn

**DISTRICT COURT
FILED**

APR 27 2015

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

SPECIAL ENTRY OF APPEARANCE

COMES NOW Reciprocity Restaurant Group, LLC d/b/a Church's Chicken and for its Special Entry of Appearance, states that pursuant to 12 O.S. §2012(A) and (B) and *Young v. Walton*, 807 P.2d 248 (Okla. 1991), it hereby enters a special appearance without waiving defenses and further reserves an additional twenty (20) days within which to answer or otherwise respond to Plaintiff's Petition, up to and including May 19, 2015. By making such a qualified special appearance, Defendant reserves the right to later assert additional defenses.

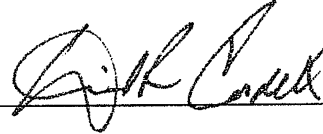
Respectfully submitted,

David R. Cordell, OBA# 11272
CONNER & WINTERS, LLP
4000 One Williams Center
Tulsa, OK 74172-0148
(918) 586-8995
(918) 586-8695 fax
dcordell@cwlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2015, I mailed a true and correct copy, with proper postage paid, to the following:

Christopher L. Camp
7122 South Sheridan Road, Suite #2-382
Tulsa, Oklahoma 74133

A handwritten signature in black ink, appearing to read "D. H. Cook", is written over a horizontal line.



**TULSA COUNTY DISTRICT COURT
STATE OF OKLAHOMA**

**DISTRICT COURT
FILED**

DEC 29 2014

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

EDWARD WATSON,

Plaintiff,

v.

**RECIPROCITY RESTAURANT
GROUP, LLC, d/b/a CHURCH'S
CHICKEN, an Oklahoma limited
liability company, and MODERN
BUSINESS ASSOCIATES, INC., a
foreign corporation,**

Defendants.

Case No.

CJ-2014-04960

**JURY TRIAL DEMANDED
ATTORNEY LIEN CLAIMED**

DANA LYNN KUEHN

PETITION

Plaintiff Edward Watson ("Watson" or "Plaintiff") hereby brings this action seeking declaratory and injunctive relief, compensatory and equitable damages, liquidated damages, punitive damages, and costs and attorney fees for violations by Defendants Reciprocity Restaurant Group, LLC, doing business as Church's Chicken ("Church's") and Modern Business Associates, Inc. ("MBA", collectively, "Defendants"), of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.*

PARTIES, JURISDICTION & VENUE

1. This action arises under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.* ("Title VII").
2. Plaintiff Edward Watson is a resident of the City of Tulsa, Tulsa County, State of Oklahoma.

2014 DEC 29 PM 3:37
SALLY HOWE SMITH
COURT CLERK
STATE OF OKLA.

3. Plaintiff is a member of a class protected by Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e (“Title VII”), to wit: African-American.
4. Defendant Reciprocity Restaurant Group, LLC, doing business as Church’s Chicken, is a domestic limited liability company that conducts business in the City of Tulsa, State of Oklahoma.
5. Church’s may be served with process by serving its registered agent, which, according to the Oklahoma Secretary of State, is Lyndon S. Johnson, 115 West 5th Street, Suite 1304, Tulsa, Oklahoma 74103.
6. Church’s is an “employer” pursuant to 42 U.S.C. § 2000e(b).
7. Church’s has more than 500 employees for each working day in each of twenty or more calendar weeks in the current or preceding calendar year.
8. Defendant Modern Business Associates, Inc. is a Florida for-profit corporation that is authorized to conduct business in the State of Oklahoma.
9. MBA may be served with process by serving its registered agent, who, according to the Oklahoma Secretary of State, is the Oklahoma Secretary of State, 2300 North Lincoln Boulevard, Suite 101, Oklahoma City, Oklahoma 73105-4897.
10. MBA is an “employer” pursuant to 42 U.S.C. § 2000e(b).
11. MBA has more than 15 employees for each working day in each of twenty or more calendar weeks in the current or preceding calendar year.
12. Defendants operate the Church’s Chicken restaurant located at 3036 South Garnett Road, Tulsa, Oklahoma 74129.
13. Church’s and MBA exercised control over the terms and conditions of the position for which Plaintiff sought to apply.

14. Plaintiff timely filed Charge of Discrimination No. 564-2011-01568 with the United States Equal Employment Opportunity Commission (“EEOC”), wherein he complained that Defendants unlawfully discriminated against him on the basis of his race by failing to hire him.
15. Plaintiff filed this action within ninety (90) days after receiving his *Dismissal and Notice of Rights* from the EEOC on October 3, 2014.
16. This Court has subject matter jurisdiction over Plaintiff’s claims pursuant to the holding in *Yellow Freight System, Inc. v. Donnelly*, 494 U.S. 820, 110 S.Ct. 1566 (1990), that state courts have concurrent jurisdiction with federal courts over civil actions brought under Title VII.
17. The venue of this action properly lies in Tulsa County District Court pursuant to OKLA. STAT. tit. 12 §§ 133 and 137.

FACTS

18. On approximately August 31, 2011, Plaintiff visited the Church’s Chicken restaurant located at 3036 South Garnett Road in Tulsa, Oklahoma, seeking employment.
19. Plaintiff requested an employment application, but was told by the manager on duty, Shift Manager Audrey Hiatt, that Church’s does not hire black people and that he would not be hired.
20. When interviewing for a position with Church’s in approximately July 2010, Audrey Hiatt was told by District Manager Jim Darden that he “preferred to hire

Mexicans” over other races/nationalities, including African-Americans, because Mexicans “are harder workers.”

FIRST CAUSE OF ACTION:
DISCRIMINATORY FAILURE TO HIRE IN VIOLATION OF TITLE VII

For his First Cause of Action, Plaintiff re-alleges and incorporates by reference all paragraphs above, and further states:

21. At all times material to Plaintiff’s First Cause of Action, Defendants shared and/or co-determined matters governing the essential terms and conditions of employment for those individuals working at the Church’s Chicken restaurant located at 3036 South Garnett Road in Tulsa, Oklahoma.
22. As an African-American, Plaintiff is protected from race-based discrimination under the provisions of Title VII, § 2000(e) *et seq.*
23. Plaintiff sought employment for an available position at the Church’s Chicken restaurant located at 3036 South Garnett Road in Tulsa, Oklahoma.
24. Plaintiff was qualified for the position for which she sought to apply.
25. Plaintiff was rejected under circumstances that give rise to an inference of unlawful race discrimination.
26. Defendants’ failure to hire Plaintiff constitutes race discrimination in violation of Title VII.
27. The acts and/or omissions by Defendants have given rise to a claim by Plaintiff for equitable damages, said damages consisting of back pay, front pay, lost employment benefits, prejudgment interest, attorney fees, and costs.
28. The acts and/or omissions by Defendants have given rise to a claim by Plaintiff for compensatory damages, said damages consisting of emotional distress, loss of

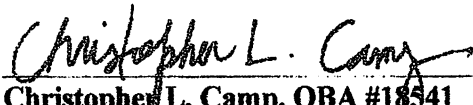
enjoyment of life, loss of self-esteem, loss of earning capacity, embarrassment, humiliation, inconvenience and mental anguish.

29. The acts and/or omissions of Defendants were willful, wanton, malicious and/or in total disregard for Plaintiff's rights, giving rise to punitive damages.

WHEREFORE, premises considered, Plaintiff Edward Watson prays for judgment against Defendants Reciprocity Restaurant Group, LLC, and Modern Business Associates, Inc., for actual, compensatory, and punitive damages (including back pay, front pay, lost employment benefits, emotional distress, loss of enjoyment of life, loss of self-esteem, loss of earning capacity, embarrassment, humiliation, inconvenience, and mental anguish) in the amount of \$375,000.00, or such other sum consistent with the evidence that Plaintiff anticipates will be presented in this case. Plaintiff also prays for prejudgment interest, attorney fees, and the costs of this action, to be taxed against Defendants, along with an award of all other relief (whether legal, equitable, or both) to which Plaintiff may be entitled and/or that the Court deems just and proper.

Respectfully submitted:

CAMP LAW FIRM

By: 
Christopher L. Camp, OBA #18541
7122 South Sheridan Road, Suite #2-382
Tulsa, Oklahoma 74133
Telephone: (918) 200-4871
Facsimile: (918) 550-8337
E-mail: ccamp@camplawtulsa.com

Attorney for Plaintiff Edward Watson

ORIGINAL SUMMONS
IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA, 500 SOUTH DENVER AVENUE, TULSA, OKLAHOMA 74103

EDWARD WATSON,)
)
 Plaintiff,)
)
v.)
)
RECIPROCITY RESTAURANT GROUP,)
LLC, et al.)
 Defendants.)

CJ-2014-04960
 Attorney(s) for Plaintiff:
 Name: Christopher Camp, OBA #18541
 Address: 7122 S. Sheridan Rd., Ste. #2-382
 Tulsa, OK 74133
 Telephone: (918) 200-4871

RECIPROCITY RESTAURANT GROUP, LLC
 c/o Lyndon S. Johnson, Registered Service Agent
 115 West 5th Street, Suite 1304
 Tulsa, Oklahoma 74103

To the above-named Respondent

Appointed to serve, PSL # _____

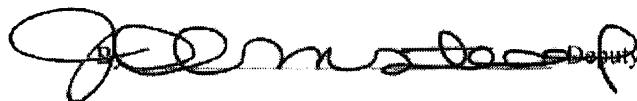
Authorized by _____

You have been sued by the above named plaintiff(s) and you are directed to file a written answer to the attached petition and order in the court at the above address within twenty (20) days after service of this summons upon you exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the plaintiff. Unless you answer the petition within the time stated judgment will be rendered against you with costs of the action.

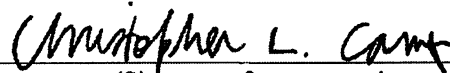
Issued this 29 day of 12, 2014.

SALLY HOWE SMITH, COURT CLERK

(Seal)

 Deputy Court Clerk

This Summons and order was served via U.S. Certified Mail on APRIL 7, 2015.


 (Signature of person serving summons)

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE SUMMONS.

Return ORIGINAL for filing.



TULSA COUNTY DISTRICT COURT
STATE OF OKLAHOMA

DISTRICT COURT
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DEC 29 2014

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Plaintiff,

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RECIPROCITY RESTAURANT
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SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

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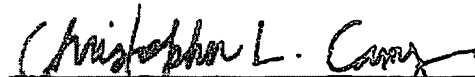
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Respectfully submitted:

CAMP LAW FIRM

By:



Christopher L. Camp, OBA #18541
7122 South Sheridan Road, Suite #2-382
Tulsa, Oklahoma 74133
Telephone: (918) 200-4871
Facsimile: (918) 550-8337
E-mail: ccamp@camplawtulsa.com

Attorney for Plaintiff Edward Watson